

[Parties and Counsel Listed on Signature Page]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**JOINT STATUS REPORT ON THE  
TIKTOK DEFENDANTS' 30(B)(6)  
WITNESS SAMANTHA KERSUL  
SEARCH TERMS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

## This Document Relates to:

## ALL ACTIONS

1 Pursuant to the Court's Order resolving Plaintiffs' motion compel the TikTok Defendants  
 2 to produce the custodial file of Rule 30(b)(6) witness Samantha Kersul (Dkt. 2327), Plaintiffs and  
 3 the TikTok Defendants (collectively, "the Parties") jointly submit this report on the status of the  
 4 Parties' negotiations concerning a reasonable subset of search terms.

5 Consistent with the Court's instruction, the Parties met and conferred via videoconference  
 6 on October 27 and again on October 30, 2025, to discuss a proposed set of search terms, which  
 7 Plaintiffs proposed on October 23 and to which the TikTok Defendants responded on October 29.  
 8 Plaintiffs sent a further revised set of search terms on October 30. The Parties have made  
 9 substantial progress and expect to continue to meet and confer to finalize the subset of search terms  
 10 consistent with the Court's Order.

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12 Dated: October 31, 2025

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Respectfully submitted,

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/s/ Felicia Craick

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FELICIA CRAICK

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**KELLER ROHRBACK LLP**

17

1201 THIRD AVENUE, SUITE 3400

18

SEATTLE&lt; WA 98101

19

Telephone: 206-623-1900

20

fcrack@kellerrohrback.com

21

RON AUSTIN

22

**RON AUSTIN LAW**

23

400 MANHATTAN BLVD.

24

HARVEY, LA 70058

25

Telephone: 504-227-8100

26

raustin@ronaustinlaw.com

27

AELISH M. BAIG

28

**ROBBINS GELLER RUDMAN & DOWD LLP**

1 MONTGOMERY STREET, #1800

SAN FRANCISCO, CA 94104

Telephone: 415-288-4545

AelishB@rgrd.com

29

PAIGE BOLDT

30

**ANAPOL WEISS**

31

130 N. 18TH STREET, #1600

1 PHILADELPHIA, PA 19103  
 2 Telephone: 215-929-8822  
 3 pboldt@anapolweiss.com

4 THOMAS P. CARTMELL  
**5 WAGSTAFF & CARTMELL LLP**  
 6 4740 Grand Avenue, Suite 300  
 Kansas City, MO 64112  
 Telephone: 816-701-1100  
 tcartmell@wcllp.com

7 SARAH EMERY  
**8 HENDY JOHNSON VAUGHN EMERY PSC**  
 9 600 WEST MAIN STREET, SUITE 100  
 LOUISVILLE, KT 40202  
 Telephone: 859-600-6725  
 semery@justicestartshere.com

10 KIRK GOZA  
**11 GOZA HONNOLD**  
 12 9500 NALL AVE. #400  
 OVERLAND PARK, KS 66207  
 Telephone: 913-412-2964  
 Kgoza @gohonlaw.com

13 RONALD E. JOHNSON, JR.  
**14 HENDY JOHNSON VAUGHN EMERY PSC**  
 15 600 WEST MAIN STREET, SUITE 100  
 LOUISVILLE, KT 40202  
 Telephone: 859-578-4444  
 rjohnson@justicestartshere.com

16 MATTHEW P. LEGG  
**17 BROCKSTEDT MANDALAS FEDERICO, LLC**  
 18 2850 QUARRY LAKE DRIVE, SUITE 220  
 BALTIMORE, MD 21209  
 Telephone: 410-421-7777  
 mlegg@lawbmf.com

19 SIN-TING MARY LIU  
**20 AYLSTOCK WITKIN KREIS & OVERHOLTZ,  
 21 PLLC**  
 22 17 EAST MAIN STREET, SUITE 200  
 PENSACOLA, FL 32502  
 Telephone: 510-698-9566  
 mliu@awkolaw.com

1 JAMES MARSH  
 2 **MARSH LAW FIRM PLLC**  
 3 31 HUDSON YARDS, 11TH FLOOR  
 4 NEW YORK, NY 10001-2170  
 Telephone: 212-372-3030  
 jamesmarsh@marshlaw.com

5 JOSEPH H. MELTER  
 6 **KESSLER TOPAZ MELTZER & CHECK LLP**  
 7 280 KING OF PRUSSIA ROAD  
 RADNOR, PA 19087  
 Telephone: 610-667-7706  
 jmeltzer@ktmc.com

9 HILLARY NAPPI  
 10 **HACH & ROSE LLP**  
 11 112 Madison Avenue, 10th Floor  
 New York, New York 10016  
 Telephone: 212-213-8311  
 hnappi@hrsclaw.com

13 EMMIE PAULOS  
 14 **LEVIN PAPANTONIO RAFFERTY**  
 15 316 SOUTH BAYLEN STREET, SUITE 600  
 PENSACOLA, FL 32502  
 Telephone: 850-435-7107  
 epaulos@levinlaw.com

17 RUTH RIZKALLA  
 18 **THE CARLSON LAW FIRM, PC**  
 19 1500 ROSECRANS AVE., STE. 500  
 MANHATTAN BEACH, CA 90266 Telephone:  
 415-308-1915 rrizkalla@carlsonattorneys.com

21 ROLAND TELLIS  
 22 DAVID FERNANDES  
 23 **BARON & BUDD, P.C.**  
 24 15910 Ventura Boulevard, Suite 1600  
 Encino, CA 91436  
 Telephone: 818-839-2333  
 rtellis@baronbudd.com  
 dfernandes@baronbudd.com

26 DIANDRA “FU” DEBROSSE  
 27 ZIMMERMANN  
 28 **DICELLO LEVITT**  
 505 20th St North  
 Suite 1500

1 Birmingham, Alabama 35203  
 2 Telephone: 205-855-5700  
 3 fu@dicellevitt.com

4 *Plaintiffs' Steering Committee Membership*

5 **LEXI J. HAZAM LIEFF CABRASER**  
**HEIMANN & BERNSTEIN, LLP**  
 6 275 BATTERY STREET, 29TH FLOOR  
 SAN FRANCISCO, CA 94111-3339  
 7 Telephone: 415-956-1000  
 lhazam@lchb.com

8 **PREVIN WARREN**  
**MOTLEY RICE LLC**  
 9 401 9th Street NW Suite 630  
 Washington DC 20004  
 10 Telephone: 202-386-9610  
 pwarren@motleyrice.com

11 *Co-Lead Counsel*

12 **CHRISTOPHER A. SEEGER**  
**SEEGER WEISS, LLP**  
 13 55 CHALLENGER ROAD, 6TH FLOOR  
 RIDGEFIELD PARK, NJ 07660  
 14 Telephone: 973-639-9100  
 cseeger@seegerweiss.com

15 *Counsel to Co-Lead Counsel and Settlement Counsel*

16 **JENNIE LEE ANDERSON**  
**ANDRUS ANDERSON, LLP**  
 17 155 MONTGOMERY STREET, SUITE 900  
 SAN FRANCISCO, CA 94104  
 18 Telephone: 415-986-1400  
 jennie@andrusanderson.com

19 *Liaison Counsel and Ombudsperson*

20 **MATTHEW BERGMAN**  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
 21 821 SECOND AVENUE, SUITE 2100  
 SEATTLE, WA 98104  
 22 Telephone: 206-741-4862  
 matt@socialmediavictims.org

23 **JAMES J. BILSBORROW**

**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

ELLYN HURD  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 212-257-8482  
ehurd@simmonsfirm.com

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

**MICHAEL M. WEINKOWITZ  
LEVIN SEDRAN & BERMAN, LLP  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com**

MELISSA YEATES  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
[myeates@ktmc.com](mailto:myeates@ktmc.com)

### *Plaintiffs' Steering Committee Leadership*

**JOSEPH VANZANDT  
BEASLEY ALLEN  
234 COMMERCE STREET MONTGOMERY, LA  
36103 Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com**

### *Federal/State Liaison*

*Attorneys for Plaintiffs*

## KING & SPALDING LLP

/s/ *Geoffrey M. Drake*

Geoffrey M. Drake, *pro hac vice*  
TaCara D. Harris, *pro hac vice*  
KING & SPALDING LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309-3521  
Telephone: (404) 572-4600  
Facsimile: (404) 572-5100  
Email: [gdrake@kslaw.com](mailto:gdrake@kslaw.com)  
[tharris@kslaw.com](mailto:tharris@kslaw.com)

David P. Mattern, *pro hac vice*  
KING & SPALDING LLP  
1700 Pennsylvania Avenue, NW, Suite 900  
Washington, DC 20006-4707  
Telephone: (202) 737-0500  
Facsimile: (202) 626-3737  
Email: [dmattern@kslaw.com](mailto:dmattern@kslaw.com)

Bailey J. Langner (SBN 307753)  
KING & SPALDING LLP  
50 California Street, Suite 3300  
San Francisco, CA 94111  
Telephone: (415) 318-1200  
Facsimile: (415) 318-1300  
Email: blangner@kslaw.com

*Attorneys for Defendants  
TikTok Inc., ByteDance Inc., TikTok Ltd.,  
ByteDance Ltd., and TikTok LLC*

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**  
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3 I, Felicia Craick, attest that concurrence in the filing of this document has been obtained  
4 from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

5 Executed this 31st day of October, 2025, at Seattle, Washington.

6 */s/ Felicia Craick*  
7 Felicia Craick

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## **CERTIFICATE OF SERVICE**

I, Sarah Skaggs, hereby certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ *Sarah Skaggs*

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Sarah Skaggs